

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KAMAL RAVIKANT,

x

Plaintiff,
- against -

**JOINT PROPOSED DISCOVERY
SCHEDULE**

**CHRISTINE H. ROHDE, M.D., JOSEPH P.
ALUKAL, M.D., JARROD BOGUE, M.D.,
COLUMBIA DOCTORS FACULTY
PRACTICE GROUP OF THE COLUMBIA
UNIVERSITY IRVING MEDICAL CENTER
AND THE NEW YORK AND
PRESBYTERIAN HOSPITAL,**

Civil Action No. 21-CV-04758

**Hon. Magistrate Judge Ona T.
Wang**

Date: September 9, 2022

Defendants.

x

Dear Hon. Magistrate Judge Wang:

We the undersigned represent Plaintiff and Defendants in the above referenced action. Pursuant to the directive of this Court's August 9, 2022 Order (ECF 97), we have further met and conferred regarding outstanding discovery issues, and have agreed reached a resolution per the following proposed discovery schedule:

1. Plaintiff to produce discovery responsive to Defendants' narrowed request ("Any and all documents, communications, emails, social media messages and/or postings prepared, sent, received, and/or posted by the plaintiff relating to any employment, investment, podcasts he engaged in or was considering engaging in, books he authored or was working on, and any other type of business ventures from October 1, 2019 through October, 31, 2020.") on or before September 23, 2022
2. Plaintiff's deposition to be completed on or before December 2, 2022 (to allow time for review of new disclosures, any further demands after consideration of same, and accounting for the Thanksgiving holiday);
3. Depositions of party defendants Dr. Alukal, Dr. Rhode, and Nurse Rovano to be completed on or before January 30, 2023 (accounting for winter holidays);
4. Thirty (30) days after completion of the depositions of party defendants, Dr. Alukal, Dr. Rhode, and Nurse Rovano, plaintiff will advise Defendants of any further fact witness(es) he seeks to depose. Defendants reserve their right to move to quash/oppose fact witness deposition(s) sought by the plaintiff.
5. Rule 30(b)(6) conference to occur on or before February 13, 2023;

6. Fact witness depositions to be completed on or before May 31, 2023;
7. Close of fact discovery on June 30, 2023;
8. Close of expert discovery on October 30, 2023.

The parties are currently scheduled to appear for an in-person conference on September 16, 2022 at 2:30 PM to discuss outstanding discovery disputes. Given that the above proposed discovery schedule resolves the parties' outstanding discovery disputes, kindly advise whether this conference will be adjourned per the directives of this Court's August 9, 2022 Order (ECF 97).

Thank you for your courtesies.

Respectfully submitted,

/s/Nanor LT Bahadurian

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